

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA  
HAMMOND DIVISION**

JAMES HILL, )  
Plaintiff, )  
 ) CAUSE NO.: 2:10-CV-393-JTM-PRC  
v. )  
 )  
MICHAEL SOLAN and )  
CITY OF HAMMOND, INDIANA )  
et al )  
Defendant. )

**PLAINTIFF'S PETITION FOR ATTORNEYS' FEES AND COSTS**

Plaintiff James Hill, by his attorneys Scott King and Lakeisha Murdaugh of the Law Offices of King & Murdaugh LLC., and Russel Brown of the Region Lawyers, petitions for attorneys' fees in this matter as follows:

1. On November 22, 2022, this Court entered a verdict in favor of Mr. Hill in the amount of \$25,500,000.00.
2. As a result of this verdict, Mr. Hill is a prevailing party on his § 1983 claims as a matter of law, and is thus entitled to an additional award of attorneys' fees and costs pursuant to 42 U.S.C. § 1988.
3. In order to prevail in this matter, and as detailed in the affidavits and time sheets, plaintiff's attorneys reasonably spent the following hours on the litigation: King 134.10; Brown 245.90; Murdaugh 309.80. Attachments A, C and D.
4. The reasonable hourly rate for plaintiff's attorneys are as follows: King \$350; Brown \$350; Murdaugh \$350. Attachments A, C and D.

5. Attorney Mitchell A. Peters represented James Hill in the above-captioned matter from July 12, 2010 until (insert date Scott was retained). At the conservative rate of \$200 per hour, Attorney Peters reasonable attorney fee is \$300,000.00. Attachment B.

6. Plaintiff also expended costs in order to litigate this case. The reasonable costs expended by the plaintiff and chargeable to the defendants under 42 U.S.C. § 1988 amount to \$8,593.59 advanced by the Law Offices of King & Murdaugh LLC. and \$34,849.27 advanced by Attorney Mitchell Peters, Attorney Robert Harper and Attorney Kevin Vanderground, for a total of \$43,442.86 in chargeable costs. Attachments B & E.

Wherefore, plaintiff requests that this court award attorneys' fees and costs in the amount of \$541,430.00, as well as all attorneys' fees and costs expended in determining this fee award.

Dated: February 7, 2023

Respectfully Submitted,

/s/ Scott King  
Scott King, #5208-45  
9211 Broadway  
Merrillville, IN 46410  
(219) 769-6300

/s/ Lakeisha Murdaugh  
Lakeisha Murdaugh, #30784-45  
9211 Broadway  
Merrillville, IN 46410  
(219) 769-6300

/s/ Russell Brown  
Russell Brown, #29628-64  
9223 Broadway  
Merrillville, IN 46410  
(219) 750-9380

**NOTICE OF FILING AND CERTIFICATE OF SERVICE**

To: David Jensen  
Rob Feldt

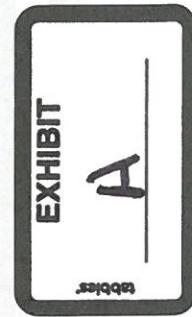
Donald Levinson  
Shana Levinson

Please take notice that on February 7, 2023 I filed with the clerk of the United States District Court for the Northern District of Indiana the attached **PLAINTIFF'S PETITION FOR ATTORNEYS' FEES AND COSTS**, a copy of which is served upon you by the court's electronic filing system.

**Time Entries**  
**Law Offices of King & Murdaugh, LLC**

USDC IN/ND case 2:10-cv-00393-TLS document 373 filed 02/06/23 page 4 of 35  
Professional = Scott King (Active Only)  
Group By Professional Group  
Client - Matter = Hill v. City of Hammond et al 2:10-CV-393 (Active Only)  
Task Code = All  
View = Original  
From 01-01-2017 To 02-06-2023

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b>James Hill</b>										
<b>Hill v. City of Hammond et al 2:10-CV-393</b>										
09-20-2017	Approved	Billable	Attorney Conference	King, Scott	0.600	350.00		210.00		
		Conference with opposing counsel								
09-22-2017	Approved	Billable	Attorney Conference	King, Scott	0.600	350.00		210.00		
		Conference with opposing counsel								
09-25-2017	Approved	Billable	Attorney Conference	King, Scott	0.600	350.00		210.00		
		Conference with opposing counsel								
12-26-2017	Approved	Billable	P400 - Initial Document Preparation / Filing	King, Scott	0.500	350.00		175.00		
		Prepare, File Appearance								
08-02-2019	Approved	Billable	L650 - Review (NOS)	King, Scott	2.200	350.00		770.00		
		Review Motion for Summary Judgement								
09-20-2019	Approved	Billable	L650 - Review (NOS)	King, Scott	1.100	350.00		385.00		
		Review Response to Motion for Summary Judgement								
09-20-2019	Approved	Billable	Attorney Conference	King, Scott	0.600	350.00		210.00		
		Conference with opposing counsel								
10-10-2019	Approved	Billable	Document Review	King, Scott	0.700	350.00		245.00		
		Review Reply to Motion for Summary Judgement								
03-25-2020	Approved	Billable	Document Review	King, Scott	0.400	350.00		140.00		
		Review Order Denying to Motion for Summary Judgement								
04-14-2022	Approved	Billable	Telephone Call	King, Scott	0.800	350.00		280.00		
		Telephone Conference with Court/Parties								
05-05-2022	Approved	Billable	Telephone Call	King, Scott	0.300	350.00		105.00		
		Telephone Conference with Magistrate/Parties								
06-18-2022	Approved	Billable	Draft Document	King, Scott	1.000	350.00		350.00		
		Draft Settlement Submission								
06-24-2022	Approved	Billable	Conference	King, Scott	3.000	350.00		1,050.00		
		Settlement Conference								
08-29-2022	Approved	Billable	Conference	King, Scott	0.300	350.00		105.00		
		Conference								
09-02-2022	Approved	Billable	Draft Document	King, Scott	0.300	350.00		105.00		
		Draft email to Magistrate								
09-20-2022	Approved	Billable	Draft Document	King, Scott	1.200	350.00		420.00		
		Review/Draft Motion in Limine								
10-01-2022	Approved	Billable	Draft Document	King, Scott	0.500	350.00		175.00		
		Review/Draft Jury Instructions								



**Time Entries**  
**Law Offices of King & Murdaugh, LLC**

Professional = Scott King (Active Only)  
 Group By Professional Group  
 Client - Matter = Hill v. City of Hammond et al 2:10-CV-393 (Active Only)  
 Task Code = All  
 View = Original  
 From 01-01-2017 To 02-06-2023

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b>James Hill</b>										
<b>Hill v. City of Hammond et al 2:10-CV-393</b>										
10-05-2022	Approved	Review Pretrial Order	Billable	Document Review	King, Scott			0.400	350.00	140.00
10-05-2022	Approved	Research/ Draft Response to Defendant's Motion in Limine	Billable	Legal Research	King, Scott			7.500	350.00	2,625.00
10-06-2022	Approved	Research/ Draft Response to Defendant's Motion in Limine	Billable	Legal Research	King, Scott			6.000	350.00	2,100.00
10-07-2022	Approved	Review Order on Motion to Strike	Billable	Document Review	King, Scott			0.300	350.00	105.00
10-21-2022	Approved	Settlement Conference.	Billable	Conference	King, Scott			2.000	350.00	700.00
10-24-2022	Approved	Pretrial Conference	Billable	Conference	King, Scott			0.500	350.00	175.00
10-25-2022	Approved	Review Pretrial Order; conference	Billable	Document Review	King, Scott			0.600	350.00	210.00
10-26-2022	Approved	Review Propose Instructions	Billable	Document Review	King, Scott			0.500	350.00	175.00
11-04-2022	Approved	Status Conference	Billable	Conference	King, Scott			0.500	350.00	175.00
11-05-2022	Approved	Review File	Billable	Document Review	King, Scott			11.000	350.00	3,850.00
11-06-2022	Approved	Review File	Billable	Document Review	King, Scott			12.000	350.00	4,200.00
11-07-2022	Approved	Attend court for trial. Travel included.	Billable		King, Scott			36.000	350.00	12,600.00
11-17-2022	Approved	Attend court for trial. Travel included.	Billable		King, Scott			18.000	350.00	6,300.00
11-21-2022	Approved	Attend court for trial. Travel included.	Billable		King, Scott			18.000	350.00	6,300.00
12-12-2022	Approved	11/21/22-11/18/22	Billable	Draft Document	King, Scott			2.000	350.00	700.00
12-29-2022	Approved	draft/file motion	Billable	Draft Document	King, Scott			1.000	350.00	350.00

Professional = Scott King (Active Only)  
 Group By Professional Group  
 Client - Matter = Hill v. City of Hammond et al 2:10-CV-393 (Active Only)  
 Task Code = All  
 View = Original

Task Code = All  
 View = Original  
 From 01-01-2017 To 02-06-2023

## Time Entries

### Law Offices of King & Murdaugh, LLC

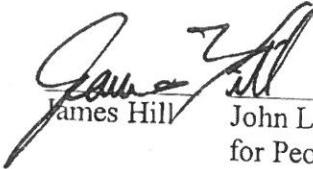
Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>James Hill</i></b>										
<b><u>Hill v. City of Hammond et al 2:10-CV-393</u></b>										
01-10-2023	Approved		Billable	Document Review	King, Scott			2.000	350.00	700.00
		Read Case Law and preparation of reply motion.								
01-10-2023	Approved	reviewed court order	Billable	Document Review	King, Scott			0.100	350.00	35.00
01-24-2023	Approved	received and read the courts opinion and order	Billable	Document Review	King, Scott			1.000	350.00	350.00
						<b>Matter Total</b>		<b>134.100</b>	<b>46,935.00</b>	
						<b>Client Total</b>		<b>134.100</b>	<b>46,935.00</b>	
						<b>Grand Total</b>		<b>134.100</b>	<b>46,935.00</b>	

## RETAINER AGREEMENT

James Hill, client, MillerFisher Law LLC, Harper and Rogers and People's Law Office, agree as follows:

1. Attorneys will represent client in the cause of action occurring in 1981 and thereafter in which client was falsely convicted in Lake County, Indiana and falsely imprisoned.
2. If no recovery is made the client shall owe no attorneys' fees.
3. This is the type of case in which attorney fees may be awarded separately from any recovery to the plaintiff. Because of this, if there is a recovery in the case then client agrees to pay to the attorney a contingent fee, computed as follows. If the case is resolved by settlement prior to trial then the attorneys will receive the greater of (a) one third of the total amount recovered or (b) an amount computed by multiplying the number of hours reasonably worked on the case by attorneys by each attorney's reasonable hourly rate. If the attorney elects to receive payment pursuant to section(b) above, he will inform the client of this prior to the settlement being agreed to. If the case goes to trial and there is an award in favor of the client then the attorney will receive the greater of (a) the reasonable attorney fees awarded by the court or agreed to by the parties, or (b) one third of the total amount recovered, including attorney fees if any.
4. Client is liable for all costs associated with this case. Costs include the court filing fee, costs reasonably incurred in serving the defendants, costs for serving subpoenas for discovery or trial, costs incurred in obtaining documents or other materials for use in the litigation (including, but not limited to, costs incurred in obtaining documents or other materials through discovery), witness fees and costs including subpoena costs and fees and costs paid to witnesses (including expert witness fees), court reporter fees and costs, costs for obtaining and duplicating depositions, travel costs reasonably incurred by attorneys, copying and printing costs for preparing pleadings in the case, and costs incurred in preparing exhibits for use in the litigation. Costs shall be prepaid by the client or paid from the client's share of the recovery.
5. No settlement shall be made without the consent of the client.
6. In the event that the client obtains different lawyers to represent him in this matter prior to final resolution, the undersigned attorneys shall be entitled to a fee of the reasonable value of services provided, which shall be the greater of either (a) one third of the total amount then being offered in settlement, or (b) an amount equal to the number of hours spent by each attorney multiplied by the hourly rate of that attorney.
7. Client acknowledges receipt of a copy of this agreement.

Dated: July 12, 2010



James Hill

John L. Stainthorp  
for People's Law Office



Bob Harper

for Harper and Rogers



Mitch Peters

for MillerFisher Law LLC

EXHIBIT

B

# MITCHELL A. PETERS ATTORNEY AT LAW LLC

Mitchell A. Peters  
mitchpeterslaw@gmail.com

750 S. Washington Street  
Valparaiso, IN 46383  
Telephone: (219) 510-5908  
Facsimile: (219) 654-2277

June 2, 2022

Mr. Scott L. King  
King & Murdaugh  
9211 Broadway  
Merrillville, Indiana 46410

Via Email: scott@kingmurdaughlaw.com

Re: James Hill

Dear Attorney King:

As you are aware, I represented James Hill over a number of years in regards to his wrongful conviction for the rape of Lisa Jaynes. My representation of James began in the latter part of 2003 until his second wrongful indictment for murder in Lake County, Indiana, in 2016. Excluding the criminal representation in the first wrongful indictment for murder, the Post-Conviction Relief matter, including all of the investigation, discovery, review of records, litigation, court proceedings and appeal was extremely complex and time consuming.

Although my entire file was turned over some years ago, in looking back over my computer files and my recollection of living with that case for a number of years, taking the depositions, the PCR trial, all of the ancillary motions and hearings, the appeal, etc, I easily had expended 1500 hours into the case over the span of years I represented James. This would be only in relation to the post-conviction relief matters; however, all of the four cases were always interrelated by the State and defense factually. At the conservative rate of \$200.00 per hour, my reasonable attorney fee in this matter would be \$300,000.00.

I have reviewed the expenses advanced in pursuit of these matters, as well as those of Attorney Robert Harper and Attorney Kevin Vanderground. The total amount advanced on behalf of James Hill is in the sum of \$34,849.27 as set forth on the itemizations included herewith.

I trust that this gives you some insight into my fees and expenses. I could specifically go through the files that you have, as well as my entire electronic record of the case, and the the number of hours expended would probably increase. I believe this is a fair and reasonable representation of my fees and expenses in this matter as they relate to the representation of James Hill in his Post-Conviction Relief matter.

USDC IN/ND case 2:10-cv-00393-TLS document 373 filed 02/06/23 page 9 of 35

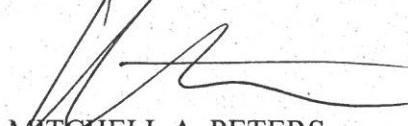
**MITCHELL A. PETERS**  
**ATTORNEY AT LAW LLC**

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Mr. Scott L. King  
June 2, 2022  
Page Two

Should you have any questions regarding this matter, please contact me. Thank you.

Very truly yours,



MITCHELL A. PETERS

MAP:dlz

Enclosures

MAP	JAMES HILL	FILE NO.	04-121/MAP
DATE	CHECK NO.	VENDOR	
			AMOUNT
			BALANCE
04-17-2005	CK #400	REBECCA HAMANN, RPR	DEPOSITION
06-09-2005	CK #457	REBECCA HAMANN, RPR	DEPOSITION
10-20-2005	CK #636	REBECCA HAMANN, RPR	DEPOSITION
12-29-2005	CK #737	DEBRA BANACH	TRANSCRIPT
12-16-2005	CK #798	REPORTERS PAPER & MANUFACTURING	DEPOSITION
04-27-2006	CK #890	REBECCA HAMANN, RPR	DEPOSITION
07-27-2006	CK #1025	CLERK, LAKE SUPERIOR COURT	FILING FEE
08-09-2006	CK #1042	FEDERAL EXPRESS	POSTAGE
08-30-2006	CK #1068	REBECCA HAMANN, RPR	DEPOSITION
06-27-2007	CK #1495	REBECCA HAMANN, RPR	DEPOSITION
07-12-2007	CK #1511	REBECCA HAMANN, RPR	DEPOSITION
10-12-2007	CK #1635	JAN SCHRADER	TRANSCRIPT
10-17-2007	CK #1638	REBECCA HAMANN, RPR	DEPOSITION
03-26-2009	CK #2315	FEDERAL EXPRESS	POSTAGE
05-07-2009	CK #2355	DR. STAN LELEK	PROF. FEES
05-15-2009	CK #2365	JAN SCHRADER	TRANSCRIPT
05-21-2009		DEPOSIT - ROBERT P. HARPER	SHARE OF EXP
06-25-2009		DEPOSIT - ROBERT P. HARPER	SHARE OF EXP
10-30-2009	CK #2591	CLERK, INDIANA COURT OF APPEALS	FILING FEE
11-25-2009	CK #2551	DEBRA BANACH	FILING FEE
11-25-2009	CK # 2552	JAN SCHRADER	FILING FEE
11-25-2009		DEPOSIT - ROBERT P. HARPER	SHARE OF EXP
12-23-2009	CK #2602	FEDERAL EXPRESS	POSTAGE
'01-28-2010	CK #2643	U.S. POSTAL SERVICE	POSTAGE
02-25-2010	CK #2676	FEDERAL EXPRESS	POSTAGE
03-16-2010	CK #2690	FEDERAL EXPRESS	POSTAGE
09-16-2010	CK #2925	CLERK, U.S. DISTRICT COURT	FILING FEE
10-14-2010	CK #2964	U.S. POSTAL SERVICE	POSTAGE
03-17-2011	CK #3172	GETZ INVESTIGATIONS	PROF. FEES
01-05-2012	CK #3516	KAREN PRICE & ASSOCIATES	DEPOSITION
05-17-2012	CK #3687	GETZ INVESTIGATIONS	PROF. FEES
11-29-2012	CK #3926	KAREN PRICE & ASSOCIATES	DEPOSITION
05-02-2013	CK #4078	STEWART RICHARDSON	DEPOSITION
06-20-2013	CK #4115	STEWART RICHARDSON	DEPOSITION
08-29-2013	CK #4174	STEWART RICHARDSON	DEPOSITION
09-19-2013	CK #4204	STEWART RICHARDSON	DEPOSITION
09-26-2013	CK #4209	STEWART RICHARDSON	DEPOSITION
11-07-2013	CK #4249	RUSSELL FISCHER	PROF. FEES
05-08-2014	CK #4390	RUSSELL FISCHER	PROF. FEES
05-08-2014	CK #4396	KEVIN VANDERGROUND	SPLIT OF ADVANCE
06-01-2014	CK #4401	KEVIN VANDERGROUND	SPLIT OF ADVANCE
07-10-2014		STEWART RICHARDSON	DEPOSITION

ROBERT	HARPER	JAMES HILL		FILE NO.	RPH	AMOUNT	<u>BALANCE</u>
		DATE	CHECK NO.	VENDOR			
07-25-2003	CK #10899	GETZ INVESTIGATIONS		INVESTIGATION	RPH	\$ 563.50	\$ 563.50
10-26-2004	CK #636	BREHON REPORTING		DEPOSITION	RPH	\$ 524.00	\$ 1,087.50
11-28-2005	CK #1099	STEVEN LYNN		WITNESS FEE	RPH	\$ 2,000.00	\$ 3,087.50
02-21-2007	CK #1025	BOSS REPORTING		DEPOSITION	RPH	\$ 2,406.74	\$ 5,494.24
05-08-2008	CK #10111	DOCU-TECH		EXHIBITS	RPH	\$ 67.20	\$ 5,561.44
06-08-2008	CK #10148	DOCU-TECH		EXHIBITS	RPH	\$ 40.00	\$ 5,601.44
05-21-2009	CK #10448	MITCHELL A. PETERS		SHARE OF ADV	RPH	\$ 2,500.00	\$ 8,101.44
06-24-2009	CK #10470	MITCHELL A. PETERS		SHARE OF ADV	RPH	\$ 1,500.00	\$ 9,601.44
09-04-2009	CK #10536	GETZ INVESTIGATIONS		SERVICE	RPH	\$ 1,114.95	\$ 10,716.39
11-24-2009	CK #10612	MITCHELL A. PETERS		SHARE OF ADV	RPH	\$ 1,200.00	\$ 11,916.39
04-25-2014	CK #12110	RUSSELL FISCHER		EXPERT WITNESS/RP	RPH	\$ 5,467.08	\$ 17,383.47

## RECAPITULATION

MITCHELL A. PETERS

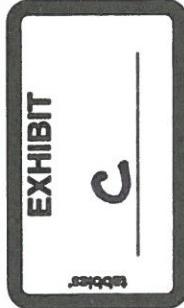
ROBERT P. HARPER

## **TOTAL ADVANCEMENTS:**

**TOTAL:**

## Activities Export

02/01/2023  
5:01 PM



Activities Export

02/01/2023  
5:01 PM

USDC IN/ND case 2:10-cv-00393-TLS document 373 filed 02/06/23 page 13 of 35

## Activities Export

02/01/2023  
5:01 PM

USDC IN/ND case 2:10-cv-00393-TLS document 373 filed 02/06/23 page 14 of 35

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		and reviewed notes to prepare for anticipated Motion for Directed Verdict of Defendant	Hill v. City of Hammond 2:10-CV-393	Brown				
		● Draft invoice 286						
11/10/2022	⌚	Attended: meeting with co-counsel	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	1.00h	\$350.00	-	\$350.00
		● Draft invoice 286						
11/10/2022	⌚	Court appearance: Travel to and from court for day 4 of trial	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	4.00h	\$350.00	-	\$1,400.00
		● Draft invoice 286						
11/09/2022	⌚	Court appearance: Travel to and from court and attend day 3 of trial.	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	10.00h	\$350.00	-	\$3,500.00
		● Draft invoice 286						
11/08/2022	⌚	Court appearance: Travel to and from court and attended day 2 of trial	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	10.00h	\$350.00	-	\$3,500.00
		● Draft invoice 286						
11/07/2022	⌚	Court appearance: Travel to and from court for trial, attended first day of trial.	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	8.00h	\$350.00	-	\$2,800.00
		● Draft invoice 286						
11/06/2022	⌚	Reviewed transcripts of trial and noted redactions. Drafted list for opposing counsel.	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	8.00h	\$350.00	-	\$2,800.00
		● Draft invoice 286						
11/06/2022	⌚	Plan and prepare for: Jury selection and opening statement	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	3.00h	\$350.00	-	\$1,050.00
		● Draft invoice 286						
					245.90h	\$0.00	\$86,065.00	245.90h
						0.00h	245.90h	

## Activities Export

02/01/2023  
5:01 PM

USDC IN/ND case 2:10-cv-00393-TLS document 373 filed 02/06/23 page 15 of 35

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
11/05/2022	(J)	Plan and prepare for: Jury selection and opening statement ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	8.00h	\$350.00	-	\$2,800.00
11/04/2022	(J)	Court appearance: Telephone conference with court regarding upcoming trial. ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.50h	\$350.00	-	\$175.00
11/02/2022	(J)	Plan and prepare for: trial by reviewing testimony from Larry Mayes' trial ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	5.00h	\$350.00	-	\$1,750.00
10/31/2022	(J)	Draft and revise: E-mail communication with opposing counsel ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.20h	\$350.00	-	\$70.00
10/30/2022	(J)	Plan and prepare for: trial by reviewing client's prior testimony ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	8.00h	\$350.00	-	\$2,800.00
10/29/2022	(J)	Plan and prepare for: trial by reviewing Defendant Solan's prior testimony ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	6.00h	\$350.00	-	\$2,100.00
10/25/2022	(J)	Review and analyze: Reviewed and analyzed transcript of FPTC from 10-24-22. Communicated with co-counsel regarding the same. ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	1.00h	\$350.00	-	\$350.00
10/18/2022	(J)	Draft and revise: Motion to	01973-HILL	Russell	1.00h	\$350.00	-	\$350.00
					245.90h			\$86,065.00
								0.00 0.00h 245.90h

## Activities Export

02/01/2023  
5:01 PM

USDC IN/ND case 2:10-cv-00393-TLS document 373 filed 02/06/23 page 16 of 35

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		Reconsider Order striking Attorney Vanes	Hill v. City of Hammond 2:10-CV-393	Brown				
		● Draft invoice 286						
10/18/2022	⌚	Draft and revise: Received and Reviewed draft of Supplemental Settlement Memo, made edits and comments, sent draft to co-counsel	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	1.50h	\$350.00	-	\$525.00
		● Draft invoice 286						
10/17/2022	⌚	Received and reviewed draft response to Defendant's Motion in Limine. Drafted edits and comments to co-counsel	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	2.00h	\$350.00	-	\$700.00
		● Draft invoice 286						
10/16/2022	⌚	Review and analyze: Received and reviewed co-counsel's memo on duty to disclose Brady information post conviction	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.50h	\$350.00	-	\$175.00
		● Draft invoice 286						
10/12/2022	⌚	Attended: Interoffice meeting with co-counsel regarding upcoming trial	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	3.00h	\$350.00	-	\$1,050.00
		● Draft invoice 286						
10/03/2022	⌚	Draft and revise: Researched and drafted Motion in limine	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	5.00h	\$350.00	-	\$1,750.00
		● Draft invoice 286						
10/03/2022	⌚	Review and analyze: draft Motion in limine from co-counsel	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	1.20h	\$350.00	-	\$420.00
		● Draft invoice 286						
					245.90h	\$0.00	\$86,065.00	245.90h
						0.00h		

## Activities Export

02/01/2023  
5:01 PM

USDC IN/ND case 2:10-cv-00393-TLS document 373 filed 02/06/23 page 17 of 35

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
10/02/2022	①	Legal research: Regarding jury instructions. Drafted proposed jury instructions	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	3.50h	\$350.00	-	\$1,225.00
		● Draft invoice 286						
09/26/2022	①	Draft and revise: Plaintiff's witness and exhibit list	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	2.50h	\$350.00	-	\$875.00
		● Draft invoice 286						
09/23/2022	①	e-mail communication with opposing counsel regarding Plaintiff's witness and exhibit list.	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.20h	\$350.00	-	\$70.00
		● Draft invoice 286						
09/21/2022	①	Draft and revise: Received and reviewed Defendant's motion to strike witnesses. Draft response to Motion to Strike.	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	1.50h	\$350.00	-	\$525.00
		● Draft invoice 286						
09/19/2022	①	Draft and revise: Plaintiff's contribution to pretrial order	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	1.50h	\$350.00	-	\$525.00
		● Draft invoice 286						
08/22/2022	①	Draft and revise: Draft response to Defendant's motion to strike experts	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	1.50h	\$350.00	-	\$525.00
		● Draft invoice 286						
08/19/2022	①	Attended: Conference with Attorney David Jensen via Teams	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	1.00h	\$350.00	-	\$350.00
		● Draft invoice 286						
08/15/2022	①	Review and analyze: Reviewed Defendant's Motion to Strike	01973-HILL Hill v. City of Hammond	Russell Brown	0.75h	\$350.00	-	\$262.50
					<b>245.90h</b>	<b>\$0.00</b>	<b>\$86,065.00</b>	<b>245.90h</b>

## Activities Export

02/01/2023  
5:01 PM

USDC IN/ND case 2:10-cv-00393-TLS document 373 filed 02/06/23 page 18 of 35

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		Experts.	2:10-CV-393					
		● Draft invoice 286						
07/15/2022	①	Review and analyze: Transcript of Hill's criminal trial	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	5.00h	\$350.00	-	\$1,750.00
		● Draft invoice 286						
07/12/2022	①	Review and analyze: Transcript of Hill's original criminal trial	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	3.00h	\$350.00	-	\$1,050.00
		● Draft invoice 286						
07/11/2022	①	Review and analyze: Reviewed transcript of Hill's criminal trial	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	3.50h	\$350.00	-	\$1,225.00
		● Draft invoice 286						
07/11/2022	①	Reviewed file and uploaded supplemental discovery via google drive to share with co-counsel	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	1.50h	\$350.00	-	\$525.00
		● Draft invoice 286						
07/01/2022	①	Draft and revise: Draft and sent to opposing counsel Plaintiff's supplemental discovery responses	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	2.00h	\$350.00	-	\$700.00
		● Draft invoice 286						
07/01/2022	①	Review and analyze: Received and reviewed e-mail from opposing counsel regarding supplemental discovery responses.	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.20h	\$350.00	-	\$70.00
		● Draft invoice 286						
06/24/2022	①	Attended: Settlement conference	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	4.00h	\$350.00	-	\$1,400.00
		● Draft invoice 286						
					245.90h			
						\$0.00	\$86,065.00	
						0.00h	245.90h	

## Activities Export

02/01/2023  
5:01 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
06/23/2022	(J)	Plan and prepare for: Judicial settlement conference ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	1.20h	\$350.00	-	\$420.00
06/20/2022	(J)	Draft and revise: E-mail to Magistrate Martin's chambers regarding the settlement submission ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.20h	\$350.00	-	\$70.00
06/20/2022	(J)	Review and analyze: Received and reviewed loss earnings report from Mr. Gibson ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	1.50h	\$350.00	-	\$525.00
06/17/2022	(J)	Office conference with: Mr. Gibson via e-mail regarding status of completion of economic report. ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.30h	\$350.00	-	\$105.00
06/13/2022	(J)	Review and analyze: Latest draft of confidential settlement statement ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.50h	\$350.00	-	\$175.00
06/10/2022	(J)	Telephone conference with: Mr. Gibson regarding obtaining social security report of client. ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.30h	\$350.00	-	\$105.00
06/10/2022	(J)	Draft and revise: Confidential settlement statement for upcoming judicial settlement conference ● Draft invoice 286	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	2.00h	\$350.00	-	\$700.00
06/07/2022	(J)	Review and analyze: Received and	01973-HILL	Russell	1.50h	\$350.00	-	\$525.00
					245.90h		\$0.00	<b>\$86,065.00</b>

## Activities Export

02/01/2023  
5:01 PM

USDC IN/ND case 2:10-cv-00393-TLS document 373 filed 02/06/23 page 20 of 35

9/14

## Activities Export

02/01/2023  
5:01 PM

USDC IN/ND case 2:10-cv-00393-TLS document 373 filed 02/06/23 page 21 of 35

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
05/18/2022	⌚	Several e-mail communication between co-counsel and Mr. Gibson regarding materials needed for his evaluation	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	1.50h	\$350.00	-	\$525.00
	●	Draft invoice 286			-			
05/17/2022	⌚	Received and drafted several e-mail correspondence between co-counsel	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	1.00h	\$350.00	-	\$350.00
	●	Draft invoice 286			-			
05/17/2022	⌚	Review and analyze: Received and reviewed client's memorandum	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	1.00h	\$350.00	-	\$350.00
	●	Draft invoice 286			-			
05/14/2022	⌚	Review and analyze: Received and reviewed Gibson fee agreement and CV. Drafted interoffice e-mail to co-counsel.	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.50h	\$350.00	-	\$175.00
	●	Draft invoice 286			-			
05/13/2022	⌚	Legal research: Researched potential economic experts. Telephone conference with Mr. Gibson. Received e-mail with Gibson's testimony report.	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	2.50h	\$350.00	-	\$875.00
	●	Draft invoice 286			-			
05/10/2022	⌚	Review and analyze: Received and reviewed draft narrative from co-counsel regarding confidential settlement statement.	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.75h	\$350.00	-	\$262.50
	●	Draft invoice 286			-			
05/05/2022	⌚	Prepare for and attend telephone	01973-HILL	Russell	0.50h	\$350.00	-	\$175.00
					245.90h		\$0.00	\$86,065.00
						0.00h	245.90h	245.90h

10/14

## Activities Export

02/01/2023  
5:01 PM

USDC IN/ND case 2:10-cv-00393-TLS document 373 filed 02/06/23 page 22 of 35

Activities Export

02/01/2023  
5:01 PM

## Activities Export

02/01/2023  
5:01 PM

USDC IN/ND case 2:10-cv-00393-TLS document 373 filed 02/06/23 page 24 of 35

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
09/21/2019	⌚	Review and analyze: Defendants' Supplemental Motion for Summary Judgement and Appendix	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	2.50h	\$350.00	-	\$875.00
	●	Draft invoice 286						
09/20/2019	⌚	Review and analyze: Review Plaintiff's Supplemental Motion for Summary Judgment and Appendix	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	2.00h	\$350.00	-	\$700.00
	●	Draft invoice 286						
09/13/2019	⌚	Telephone conference with: E-mail communication with opposing counsel regarding extension of time to file Plaintiff's Response to Defendants' Supplemental Motion for Summary Judgment.	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.20h	\$350.00	-	\$70.00
	●	Draft invoice 286						
08/28/2019	⌚	Draft and revise: Draft and filed Motion for Extension of Time to respond to Plaintiff's Supplemental Motion for Summary Judgment	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.50h	\$350.00	-	\$175.00
	●	Draft invoice 286						
06/07/2019	⌚	Review and analyze: Reviewed and catalog file	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	1.00h	\$350.00	-	\$350.00
	●	Draft invoice 286						
06/06/2019	⌚	Review and analyze: Reviewed and catalog file	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	2.00h	\$350.00	-	\$700.00
	●	Draft invoice 286						
05/31/2019	⌚	Draft and revise: Draft and filed Plaintiff's Objection to Defendants' Motion for Supplemental MSJ	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.50h	\$350.00	-	\$175.00
	●	Draft invoice 286						
							<b>245.90h</b>	<b>\$0.00</b>
								<b>\$86,065.00</b>
								245.90h

## Activities Export

02/01/2023  
5:01 PM

USDC IN/ND case 2:10-cv-00393-TLS document 373 filed 02/06/23 page 25 of 35

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Draft invoice 286						
05/29/2019	⌚	Review and analyze: Reviewed and catalog contents of file	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	2.50h	\$350.00	-	\$875.00
		● Draft invoice 286						
05/28/2019	⌚	Review and analyze: Reviewed filed to organize and catalog	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	2.00h	\$350.00	-	\$700.00
		● Draft invoice 286						
05/23/2019	⌚	Draft and revise: Draft and Filed Appearance	01973-HILL Hill v. City of Hammond 2:10-CV-393	Russell Brown	0.20h	\$350.00	-	\$70.00
		● Draft invoice 286						
					245.90h	\$0.00	\$86,065.00	
						0.00h	245.90h	

**Time Entries**  
**Law Offices of King & Murdaugh, LLC**

Professional = Lakeisha Murdaugh (Active Only)  
 Group By Professional Group  
 Client - Matter = Hill v. City of Hammond et al 2:10-CV-393 (Active Only)  
 Task Code = All  
 View = Original  
 From 01-01-2022 To 01-27-2023

Date	Status	Approval	Billable Type	Task	Professional	Start	Stop	Duration	Rate	Amount
<b>James Hill</b>										
<b>Hill v. City of Hammond et al 2:10-CV-393</b>										
04-04-2022	Approved		Billable	Attorney Conference	Murdaugh, Lakeisha			0.500	350.00	175.00
			Meeting with co-counsel regarding trial preparation and trial strategy.	Court	Murdaugh, Lakeisha			0.500	350.00	175.00
04-14-2022	Approved		Billable	Attended status conference.	Murdaugh, Lakeisha			1.000	350.00	350.00
04-14-2022	Approved		Billable	Client Conference	Murdaugh, Lakeisha			0.100	350.00	35.00
04-18-2022	Approved		Billable	Meeting with Hill regarding case updates, mediation and trial.	Murdaugh, Lakeisha			0.200	350.00	70.00
			Email		Murdaugh, Lakeisha			0.300	350.00	105.00
04-18-2022	Approved		Billable	Received and reviewed email regarding mediation.	Murdaugh, Lakeisha			1.500	350.00	525.00
04-26-2022	Approved		Billable	Received and reviewed email from co-counsel.	Murdaugh, Lakeisha			5.500	350.00	1,925.00
			Email		Murdaugh, Lakeisha			0.200	350.00	70.00
04-27-2022	Approved		Billable	Reviewed and analyzed proposed stipulation for upcoming settlement conference.	Murdaugh, Lakeisha			0.500	350.00	175.00
			Email		Murdaugh, Lakeisha			2.500	350.00	875.00
04-30-2022	Approved		Billable	Reviewed Police Reports Volumes I & II and Solan's notes. Created timeline for James Hill cases.	Murdaugh, Lakeisha			1.200	350.00	420.00
05-03-2022	Approved		Billable	Sent email to co-counsel regarding Hill's case timeline.	Murdaugh, Lakeisha			1.000	350.00	350.00
05-05-2022	Approved		Billable	Court Attended court telephonically.	Murdaugh, Lakeisha			0.400	350.00	140.00
			Email		Murdaugh, Lakeisha			0.300	350.00	105.00
05-05-2022	Approved		Billable	Client Conference Meeting with Hill regarding case updates, mediation and trial.	Murdaugh, Lakeisha			5.300	350.00	1,855.00
05-10-2022	Approved		Billable	Reviewed, analyzed and edited draft from co-counsel regarding Hill's settlement statement.	Murdaugh, Lakeisha			0.600	350.00	210.00
05-12-2022	Approved		Billable	Client Conference Meeting with Hill regarding case updates, mediation and trial.	Murdaugh, Lakeisha					
05-14-2022	Approved		Billable	Received and reviewed expert report.	Murdaugh, Lakeisha					
05-18-2022	Approved		Billable	Received emails regarding expert materials.	Document Review	Murdaugh, Lakeisha				
			Email		Document Review	Murdaugh, Lakeisha				
05-20-2022	Approved		Billable	Reviewed case files and gather materials requested by expert.	Email	Murdaugh, Lakeisha				
			Email		EXHIBIT D					



**Time Entries**  
**Law Offices of King & Murdaugh, LLC**

Professional = Lakeisha Murdaugh (Active Only)  
 Group By Project Group  
 Client - Matter = Hill v. City of Hammond et al 2:10-CV-393 (Active Only)  
 Task Code = All  
 View = Original

Date	Status	Approval	Billable Type	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>James Hill</i></b>										
<b><u>Hill v. City of Hammond et al 2:10-CV-393</u></b>										

07-14-2022	Approved		Billable	Email	Murdaugh, Lakeisha				385.00	
		Received and reviewed email to opposing counsel regarding Hill discovery upload regarding Leroy Ford documents.								
08-16-2022	Approved		Billable	Email	Murdaugh, Lakeisha				35.00	
		Received and reviewed email from opposing counsel regarding scheduling an attorney conference.								
08-17-2022	Approved		Billable	Email	Murdaugh, Lakeisha				35.00	
		Received and reviewed email from co-counsel regarding defendant's filing.								
08-17-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha				770.00	
		Reviewed defendant's motion to strike expert witness. Researched case law.								
08-19-2022	Approved		Billable	Attorney Conference	Murdaugh, Lakeisha				350.00	
		Attended conference with opposing counsel via MS Teams.								
08-19-2022	Approved		Billable	Client Conference	Murdaugh, Lakeisha				700.00	
		Meeting with Hill regarding case updates, mediation and trial.								
08-20-2022	Approved		Billable	Legal Research	Murdaugh, Lakeisha				1,190.00	
		Researched case law. Reviewed Connick v. Thompson. Morales and its progeny.								
08-22-2022	Approved		Billable	Email	Murdaugh, Lakeisha				175.00	
		Received and reviewed email from co-counsel regarding response to defendant's motion to strike expert disclosures.								
08-23-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha				280.00	
		Reviewed draft 1983 complaint for consideration during upcoming mediation.								
08-29-2022	Approved		Billable	Client Conference	Murdaugh, Lakeisha				525.00	
		Meeting with Hill regarding case updates, mediation and trial.								
08-29-2022	Approved		Billable	Settlement Conference	Murdaugh, Lakeisha				525.00	
		Meeting with opposing counsel in attempt to reach a mutually agreeable resolution.								
09-02-2022	Approved		Billable	Email	Murdaugh, Lakeisha				35.00	
		Received and reviewed email regarding Hill's rejection of the settlement offer.								
09-15-2022	Approved		Billable	Court	Murdaugh, Lakeisha				175.00	
		Attended status teleconference with court.								
09-19-2022	Approved		Billable	Email	Murdaugh, Lakeisha				35.00	
		Received and reviewed email regarding pretrial order.								
09-19-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha				175.00	
		Review plaintiff's contributions to pretrial order.								
09-21-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha				420.00	
		Reviewed and drafted response to defendant's motion to strike witnesses.								
09-22-2022	Approved		Billable	Email	Murdaugh, Lakeisha				35.00	
		Received and reviewed email from opposing counsel.								

Professional = Lakeisha Murdaugh (Active Only)  
Group By Professional Group  
Client - Matter = Hill v. City of Hammond et al 2:10-CV-393 (Active Only)

Task Code = All  
View = Original

From 01-01-2022 To 01-27-2023

Time Entries  
Law Offices of Ki

Date	Status	Approval	Billable Type	Task	Professional	Start	Stop	Duration	Rate	Amount
<b>James Hill</b>										
<b>Hill v. City of Hammond et al 2:10-CV-393</b>										
09-23-2022	Approved		Billable	Email	Murdaugh, Lakeisha	0.200	350.00	70.00		
	Received and reviewed email to/from opposing counsel.		Billable	Document Review	Murdaugh, Lakeisha	2.000	350.00	700.00		
09-23-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha	6.500	350.00	2,275.00		
09-24-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha	2.900	350.00	1,015.00		
09-25-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha	1.300	350.00	455.00		
09-26-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha	0.300	350.00	105.00		
09-26-2022	Approved		Billable	Email	Murdaugh, Lakeisha	2.500	350.00	875.00		
09-28-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha	0.100	350.00	35.00		
09-28-2022	Approved		Billable	Email	Murdaugh, Lakeisha	2.300	350.00	805.00		
09-29-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha	0.100	350.00	35.00		
09-30-2022	Approved		Billable	Email	Murdaugh, Lakeisha	0.200	350.00	70.00		
10-02-2022	Approved		Billable	Legal Research	Murdaugh, Lakeisha	4.200	350.00	1,470.00		
10-02-2022	Approved		Billable	Email	Murdaugh, Lakeisha	0.100	350.00	35.00		
10-03-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha	3.300	350.00	1,155.00		
10-06-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha	3.000	350.00	1,050.00		
10-08-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha	0.300	350.00	105.00		
10-08-2022	Approved		Billable	Email	Murdaugh, Lakeisha	0.200	350.00	70.00		
10-12-2022	Approved		Billable	Email	Murdaugh, Lakeisha					

**Time Entries**  
**Law Offices of King & Murdaugh, LLC**

Professional = Lakeisha Murdaugh (Active Only)  
 Group By Professional Group  
 Client - Matter = Hill v. City of Hammond et al 2:10-CV-393 (Active Only)  
 Task Code = All  
 View = Original

From 01-01-2022 To 01-27-2023

Date	Status	Approval	Billable Type	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>James Hill</i></b>										
<b>Hill v. City of Hammond et al 2:10-CV-393</b>										
10-12-2022	Approved		Billable	Attorney Conference	Murdaugh, Lakeisha			3.300	350.00	1,155.00
		Meeting with co-counsel to discuss trial preparation and strategies.		Draft Document	Murdaugh, Lakeisha			2.800	350.00	980.00
10-14-2022	Approved	Draft responses to MILs.	Billable	Email	Murdaugh, Lakeisha			0.200	350.00	70.00
10-14-2022	Approved	Sent email of draft MIL responses to co-counsels.	Billable	Email	Murdaugh, Lakeisha			0.400	350.00	140.00
10-15-2022	Approved	Received and reviewed emails from co-counsel regarding Brady obligation post trial.	Billable	Legal Research	Murdaugh, Lakeisha			4.500	350.00	1,575.00
10-15-2022	Approved	Reviewed Silva and related case law regarding admissibility and materiality.	Billable	Legal Research	Murdaugh, Lakeisha			1.500	350.00	525.00
10-16-2022	Approved	Legal research regarding Bertha Franklin document and the Brady duty post-conviction.	Billable	Email	Murdaugh, Lakeisha			0.700	350.00	245.00
10-19-2022	Approved	Reviewed and responded to emails from co-counsel regarding edited MIL responses.	Billable	Email	Murdaugh, Lakeisha			2.200	350.00	770.00
10-19-2022	Approved	Reviewed, analyzed and responded to emails from co-counsel regarding edited MIL responses and motion to reconsider.	Billable	Settlement Conference	Murdaugh, Lakeisha			3.000	350.00	1,050.00
10-21-2022	Approved	Meeting with opposing counsel in attempt to reach a mutually agreeable resolution.	Billable	Email	Murdaugh, Lakeisha			0.100	350.00	35.00
10-21-2022	Approved	Received and reviewed email regarding Hill's rejection of settlement offer.	Billable	Document Review	Murdaugh, Lakeisha			8.400	350.00	2,940.00
10-22-2022	Approved	Read deposition transcripts and other testimony of Michael Solan.	Billable	Document Review	Murdaugh, Lakeisha			5.200	350.00	1,820.00
10-23-2022	Approved	Read deposition transcripts and other testimony of Michael Solan.	Billable	Pretrial Conference	Murdaugh, Lakeisha			1.000	350.00	350.00
10-24-2022	Approved	Attended telephonic pretrial conference.	Billable	Legal Research	Murdaugh, Lakeisha			3.400	350.00	1,190.00
		Conducted research regarding requirement to introduce trial transcript for 1983 claim.		Draft Document	Murdaugh, Lakeisha			0.800	350.00	280.00
10-25-2022	Approved	Drafted response to defendant's motion to read trial transcript as the first evidence is the case.		Document Review	Murdaugh, Lakeisha			1.500	350.00	525.00
10-25-2022	Approved	Read FFTC transcript and took trial notes.	Billable	Client Conference	Murdaugh, Lakeisha			1.500	350.00	525.00
10-26-2022	Approved	Meeting with Hill regarding case updates, mediation and trial.								

**Time Entries**  
**Law Offices of King & Murdaugh, LLC**

Professional = Lakeisha Murdaugh (Active Only)  
 Group By Professional Group  
 Client - Matter = Hill v. City of Hammond et al 2:10-CV-393 (Active Only)  
 Task Code = All  
 View = Original  
 From 01-01-2022 To 01-27-2023

Date	Status	Approval	Billable Type	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>James Hill</i></b>										
<b><u>Hill v. City of Hammond et al 2:10-CV-393</u></b>										
10-27-2022	Approved		Billable	Efile	Murdaugh, Lakeisha			0.200	350.00	70.00
			Upload response to defendant's motion to read trial transcript as the first evidence is the case to electronic filing system.							
10-27-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			7.800	350.00	2,730.00
			Read deposition transcripts of James Hill and Thomas Vanes.							
10-27-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			2.800	350.00	980.00
			Read deposition transcripts of Thomas Vanes.							
10-28-2022	Approved		Billable	Efile	Murdaugh, Lakeisha			0.200	350.00	70.00
			Uploaded supplemental proposed jury instructions to electronic filing system.							
10-28-2022	Approved		Billable	Trial Preparation	Murdaugh, Lakeisha			3.000	350.00	1,050.00
			Meeting with co-counsel and Thomas Vanes regarding upcoming trial.							
10-29-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.200	350.00	70.00
			Received, reviewed and responded to emails between co-counsel.							
10-29-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			7.800	350.00	2,730.00
			Read deposition transcripts of James Hill and Thomas Vanes.							
10-30-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			3.300	350.00	1,155.00
			Read deposition transcript and other testimony of James Hill.							
10-31-2022	Approved		Billable	Client Conference	Murdaugh, Lakeisha			1.500	350.00	525.00
			Meeting with Hill regarding case updates, mediation and trial.							
10-31-2022	Approved		Billable	Court	Murdaugh, Lakeisha			0.800	350.00	280.00
			Attended telephonic court hearing regarding miscellaneous trial orders.							
11-02-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.400	350.00	140.00
			Received and reviewed email from Thomas Vanes regarding upcoming trial.							
11-04-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.200	350.00	70.00
			Received and reviewed email from co-counsel.							
11-05-2022	Approved		Billable	Trial Preparation	Murdaugh, Lakeisha			8.000	350.00	2,800.00
			Reviewed relevant case documents and researched case law for trial purposes.							
11-06-2022	Approved		Billable	Trial Preparation	Murdaugh, Lakeisha			6.500	350.00	2,275.00
			Reviewed relevant case documents and researched case law for trial purposes.							
11-06-2022	Approved		Billable	Client Conference	Murdaugh, Lakeisha			2.000	350.00	700.00
			Meeting with Hill regarding case updates, mediation and trial.							
11-07-2022	Approved		Billable	Court	Murdaugh, Lakeisha			8.500	350.00	2,975.00
			Attended court for trial. Travel included.							
11-08-2022	Approved		Billable	Court	Murdaugh, Lakeisha			9.500	350.00	3,325.00
			Attended court for trial. Travel included.							

**Time Entries**  
**Law Offices of King & Murdaugh, LLC**

Date	Status	Approval	Billable Type	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>James Hill</i></b>										
<b><i>Hill v. City of Hammond et al 2:10-CV-393</i></b>										
11-09-2022	Approved		Billable	Court	Murdaugh, Lakeisha			9.500	350.00	3,325.00
			Attended court for trial. Travel included.							
11-10-2022	Approved		Billable	Court	Murdaugh, Lakeisha			5.500	350.00	1,925.00
			Attended court for trial. Travel included.							
11-10-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			1.700	350.00	595.00
			Read deposition transcript of Larry Furnas.							
11-14-2022	Approved		Billable	Client Conference	Murdaugh, Lakeisha			5.500	350.00	1,925.00
			Meeting with Hill regarding trial preparation.							
11-15-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			2.500	350.00	875.00
			Read trial transcript of Solan's testimony and took notes.							
11-16-2022	Approved		Billable	Trial Preparation	Murdaugh, Lakeisha			8.500	350.00	2,975.00
			Reviewed relevant case documents and researched case law for trial purposes. Prepared for Hill's Direct examination.							
11-17-2022	Approved		Billable	Court	Murdaugh, Lakeisha			9.000	350.00	3,150.00
			Attended court for trial. Travel included.							
11-18-2022	Approved		Billable	Court	Murdaugh, Lakeisha			9.000	350.00	3,150.00
			Attended court for trial. Travel included.							
11-19-2022	Approved		Billable	Legal Research	Murdaugh, Lakeisha			5.800	350.00	2,030.00
			Researched case law regarding defendants' directed verdict motions							
11-20-2022	Approved		Billable	Trial Preparation	Murdaugh, Lakeisha			6.000	350.00	2,100.00
			Reviewed relevant case documents and researched case law for trial purposes.							
11-21-2022	Approved		Billable	Court	Murdaugh, Lakeisha			11.500	350.00	4,025.00
			Attended court for trial. In-office conference with co-counsel regarding next day of trial. Travel included.							
11-22-2022	Approved		Billable	Court	Murdaugh, Lakeisha			12.000	350.00	4,200.00
			Attended court for trial. Received jury verdict. Travel included.							
11-23-2022	Approved		Billable	Client Conference	Murdaugh, Lakeisha			1.300	350.00	455.00
			Meeting with Hill regarding trial outcome and future expectations.							
11-30-2022	Approved		Billable	Draft Document	Murdaugh, Lakeisha			1.200	350.00	420.00
			Drafted response to Defendant COH notice of additional authorities to support motion for directed verdict.							
11-30-2022	Approved		Billable	Legal Research	Murdaugh, Lakeisha			0.800	350.00	280.00
			Drafted response to Defendant COH notice of additional authorities to support motion for directed verdict.							
12-01-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			1.000	350.00	350.00
			Reviewed defendant's reply to response motion.							
12-01-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			2.700	350.00	945.00
			Reviewed Defendant Solan's motion and brief in support.							

**Time Entries**  
**Law Offices of King & Murdaugh, LLC**

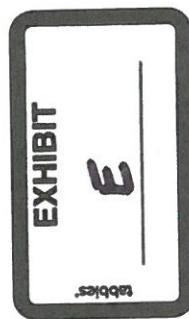
Professional = Lakeisha Murdaugh (Active Only)  
 Group By Professional Group  
 Client - Matter = Hill v. City of Hammond et al 2:10-CV-393 (Active Only)  
 Task Code = All  
 View = Original  
 From 01-01-2022 To 01-27-2023

Date	Status	Approval	Billable Type	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>James Hill</i></b>										
<b><u>Hill v. City of Hammond et al 2:10-CV-393</u></b>										
12-02-2022	Approved		Billable	Legal Research	Murdaugh, Lakeisha			3.200	350.00	1,120.00
			Conducted research regarding Defendant' Solan's motion and brief in support.							
12-02-2022	Approved		Billable	Draft Document	Murdaugh, Lakeisha			4.400	350.00	1,540.00
			Drafted response to Defendant' Solan's motion and brief in support.							
12-12-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			0.500	350.00	175.00
			Read draft motion for prejudgment interest.							
12-12-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			0.500	350.00	175.00
			Review draft motion to enter judgment on the verdict.							
12-12-2022	Approved		Billable	Email	Murdaugh, Lakeisha			0.200	350.00	70.00
			Received and reviewed email from co-counsel.							
12-13-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			2.000	350.00	700.00
			Reviewed motion and cited case law for miscellaneous relief.							
12-20-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			1.000	350.00	350.00
			Reviewed defendant's reply to response to motion.							
12-20-2022	Approved		Billable	Legal Research	Murdaugh, Lakeisha			3.000	350.00	1,050.00
			Researched case law cited in defendant's reply to response to motion.							
12-22-2022	Approved		Billable	Legal Research	Murdaugh, Lakeisha			2.500	350.00	875.00
			Researched case law in preparation of reply motion.							
12-29-2022	Approved		Billable	Document Review	Murdaugh, Lakeisha			1.800	350.00	630.00
			Reviewed reply motion and case law cited prior to filing.							
01-10-2023	Approved		Billable	Document Review	Murdaugh, Lakeisha			1.200	350.00	420.00
			Reviewed joint sur-reply by defendants.							
01-10-2023	Approved		Billable	Document Review	Murdaugh, Lakeisha			0.100	350.00	35.00
			Reviewed court order.							
01-14-2023	Approved		Billable	Legal Research	Murdaugh, Lakeisha			6.500	350.00	2,275.00
			Read and analyzed case law cited in joint sur-reply by defendants. Research rebuttal cases.							
01-24-2023	Approved		Billable	Document Review	Murdaugh, Lakeisha			1.200	350.00	420.00
			Received and read the court's opinion and order.							
					<b>Matter Total</b>	<b>309.800</b>				<b>108,430.00</b>
					<b>Client Total</b>	<b>309.800</b>				<b>108,430.00</b>
					<b>Grand Total</b>	<b>309.800</b>				<b>108,430.00</b>

## Activities Export

01/24/2023  
9:36 PM

USDC IN/ND case 2:10-cv-00393-TLS document 373 filed 02/06/23 page 34 of 35



STATE OF INDIANA                  )  
    ) SS:  
COUNTY OF LAKE                  )

**AFFIDAVIT OF SCOTT KING**

Scott King, first being duly sworn, states as follows:

1. I am the lead counsel for the plaintiff in the case of James Hill v. City of Hammond, et al, 2:10 CV 393.

2. I undertook representation of the plaintiff on December 26, 2017.

3. Prior to that time, the plaintiff was represented by attorney Mitchell Peters and others.

Mr. Peters ceased his representation of the plaintiff on July 6, 2016.

4. At the time I undertook representation of the plaintiff, Lakeisha Murdaugh and Russell Brown were associated with me in my practice and the representation of the plaintiff.

5. Thereafter, beginning on January 1, 2022, Russell Brown initiated his own law practice but continued in his representation of the plaintiff along with affiant and Ms. Murdaugh.

6. I have reviewed Attachments A-E to the Plaintiff's Petition for Fees and Expenses and, to the best of my knowledge, information and belief, the information contained in those Attachments is accurate.

FURTHER AFFIANT SAITH NOT:

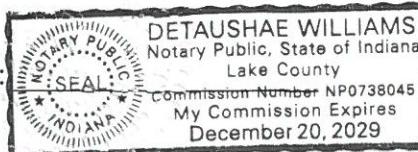
s/ Scott King  
\_\_\_\_\_  
Scott King

SUBSCRIBED AND SWORN TO ME, A NOTARY PUBLIC FOR THE STATE OF

INDIANA, this 6<sup>th</sup> Day of February, 2023.

D. Taushae Williams  
Notary Public

My Commission Expires:



**EXHIBIT**

**F**